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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of: )  
)  
Request by TV 14, Inc. )  
to Amend Section 76.51 of the )  
Commission's Rules to Include )  
Rome, Georgia, in the Atlanta, )  
Georgia, Television Market )

MM Docket No. 92-295  
RM-8016

To: The Commission

**COMMENTS and COUNTERPROPOSAL of the  
GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION**

The Georgia Public Telecommunications Commission ("GPTC"), licensee of noncommercial educational television Station WGTV(TV), Athens, Georgia ("WGTV"), by its attorneys, hereby submits its Comments and Counterproposal with respect to the Commission's Notice of Proposed Rule Making ("NPRM")<sup>1/</sup> issued in the above-captioned proceeding. In that NPRM, the Commission is proposing to revise Section 76.51 of its Rules and to redefine the Atlanta television market as the Atlanta-Rome market. For the reasons set forth below, the GPTC urges the Commission to add Athens as a designated community in the market, such that the market is the "Atlanta-Rome-Athens" market.

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<sup>1/</sup> FCC 92-536 (released December 8, 1992).

I. STATEMENT OF INTEREST

The GPTC is an agency of the State of Georgia charged with providing public telecommunications services, including both public television and radio service, to the residents of the State of Georgia. To fulfill that mission, the GPTC is the licensee of nine public television stations, twelve television translators, and eleven public radio stations located throughout the State. The various television stations operated by the GPTC (including WGTV) form the Georgia Public Television Network, which provides instructional and public television service to school systems and residents in the State.<sup>2/</sup> During the school day, these stations broadcast in-school instructional programming and, during the evenings and on weekends they offer public television programming. The GPTC's flagship television station is Station WGTV, whose transmitter is located on Stone Mountain, immediately outside of Atlanta, and which serves the Atlanta metropolitan area, as well as Athens.

In these comments, GPTC asks the Commission to eliminate the long-standing marketplace anomaly in which the major ratings services place Athens in the Atlanta market and recognize WGTV as an Atlanta market station, although the station is not recognized as an Atlanta market station in Section 76.51 of the Commission's Rules (the "Table of Markets") because Athens is not a designated community in the Atlanta market. This lack of Commission

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<sup>2/</sup> The noncommercial FM radio stations are operated as the Peach State Public Radio Network.

recognition that WGTV is an Atlanta market station hampers the GPTC's ability to generate underwriting contributions from both Atlanta and from sources outside the State of Georgia. The loss of this potential revenue limits the GPTC's ability to make the maximum contribution to the educational and cultural services offered not only in the Atlanta metropolitan area, but also in the remainder of the state. The identification of Station WGTV as an Athens station, rather than one serving the entire Atlanta market, suggests that the station's reach and the potential audience size is limited to Athens alone, when in fact the station serves the entire Atlanta market and has done so for many years.

In the NPRM, the Commission proposes to change Atlanta's market designation in the Table of Markets from "Atlanta" to "Atlanta-Rome." The Commission's proposal is in response to a Petition for Rule Making filed by TV 14, Inc., licensee of Station WTLK(TV), Channel 14, Rome ("TV 14"), which argues that it is necessary to add Rome formally to the Atlanta market in order for Station WTLK to be considered a local station in the Atlanta area under the cable compulsory license. NPRM at ¶ 2. The GPTC does not object to this request, but believes that the market is more accurately described as the "Atlanta-Rome-Athens" market. The GPTC believes that the economic and public interest factors which justify adding Rome to the Atlanta market also

support the addition of Athens to the Atlanta market.<sup>3/</sup> Accordingly, as a counterproposal, GPTC requests that the Commission accommodate TV 14 and WGTV by changing the Atlanta market designation in the Table of Markets from "Atlanta" to "Atlanta-Rome-Athens."

## II. WGTV IS AN ATLANTA MARKET STATION

In the NPRM, the Commission focused on a number of specific factors in concluding that TV 14 made a sufficient case to warrant commencement of a rulemaking proposing to add Rome to the Atlanta market. Specifically, the Commission noted (a) that Station WTLK and the stations licensed to Atlanta appear to have substantially overlapping coverage areas, (b) that Station WTLK and the Atlanta stations compete for viewership, (c) that Arbitron already lists Rome within the Atlanta ADI, (d) that Station WTLK's market-area program listings consider Station WTLK local in the Atlanta market, and (e) that, although Rome and Atlanta are some 56 miles distant and the facilities of the Rome and Atlanta stations are not collocated, the Commission has already concluded that the relative location of the transmitters of the stations renders them unavoidably competitive. NPRM at ¶ 7.

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<sup>3/</sup> Furthermore, addition of Athens to the Georgia market in this proceeding will obviate the need for the GPTC to file a separate rulemaking request, thereby facilitating an expedited resolution of the matter and relieving the processing burden on the FCC.

GPTC submits that each of these factors apply equally to WGTV and strongly favor the addition of Athens to the Atlanta market. Athens is 66 miles northeast of Atlanta, and the major ratings services include Athens in the Atlanta television market. For example, Arbitron's market designation for Atlanta is "Atlanta (Athens & Rome)", and Nielsen includes Athens in the Atlanta DMA. Furthermore, WGTV operates from a transmitter located less than 15 miles east of Atlanta on Stone Mountain.<sup>4/</sup> As a result, WGTV's city-grade contour covers all of the city of Atlanta and most of the Atlanta Metro area (as defined by Arbitron and Nielsen). WGTV's Grade B contour covers the entire Atlanta television market, see Exhibit 1, and its coverage is comparable to that of the Atlanta stations. See Exhibit 2.

By virtue of the proximity of Athens to Atlanta and the location of WGTV's transmitter, WGTV is unquestionably perceived as an Atlanta station and its programming competes for audiences with the commercial stations in the market. Also, WGTV is presently carried on 87 cable systems in the 56 counties identified by Nielsen as inside the Atlanta television market. To the best of GPTC's knowledge, WGTV is carried on the basic service tier by all Atlanta market cable systems. In addition, both the trade press and the Atlanta media have long recognized WGTV's presence in the Atlanta market. TV Guide, for instance,

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<sup>4/</sup> One Atlanta radio station, WABE-FM, is collocated with Channel 8 on Stone Mountain. Most of the Atlanta market television stations operate from transmitter sites in or around the city of Atlanta.

lists WGTV as an "Athens/Atlanta" station, while the Atlanta Journal-Constitution lists WGTV as an "Atlanta" station in their weekly program guide. See Exhibit 3. The Atlanta Journal-Constitution has also consistently provided news coverage of WGTV's programming. See Exhibit 4.

WGTV's ratings performance also reflects its status as part of the Atlanta market. Thus, during the 1982-1983 season, WGTV achieved a weekly "cume" rating of 27% in the Nielsen ratings, meaning that 27% of all households in the Atlanta Metro area watched WGTV at least once a week, and, as of July, 1992, Nielsen indicated that WGTV averaged a 57% "cume" in the Atlanta Metro area.<sup>5/</sup> The station's most recent audience analysis (November, 1992) shows that WGTV has achieved a 60% "cume", which translates into some 905,000 households and 2,353,000 persons in the Atlanta Metro area who watch the station at least once a week. And, a large number of those viewers support the GPTC. As of December 29, 1992, the GPTC had 35,334 members in the Atlanta Metro area, more than half of the total number of public television members in the entire state of Georgia, and during the calendar year 1992, those 35,000 Atlanta Metro members contributed \$2,248,300 to GPTC's operations, representing 64% of the State's public television membership dollars. GPTC therefore submits that WGTV

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<sup>5/</sup> By comparison, the National Public Television Cume Rating (i.e., that for public television stations throughout the United States) is 53%.

is at least as much an Atlanta market station as is Station WTLK(TV).

Moreover, while WGTV is a public television station, that fact does not affect the economic and other realities concerning WGTV's presence in the Atlanta market. The Commission has in a number of contexts recognized that noncommercial television stations have local service obligations that are comparable to those imposed on commercial television stations, and that noncommercial television stations are therefore to be considered when determining how much television service is provided to a given market. For instance, the Commission counts noncommercial television stations when determining the "white" and "gray" areas served by commercial television applicants, noting that "noncommercial educational stations now have an obligation to serve the programming needs of their communities and . . . such stations cannot be excluded from the analysis of existing service." Channel 32 Broadcasting Company, 6 FCC Rcd 5188 (1992), recon. denied, 7 FCC Rcd 1694 (1992); see also Valley Broadcasters, Inc., 5 FCC Rcd 2785, 2788 (1990). The Commission similarly counts noncommercial television stations when determining whether an applicant seeking a waiver of the Commission's duopoly rule has met the "Top 25 Markets/30 Voices" test. See, e.g., Susquehanna Radio Corp., 6 FCC Rcd 6547 (1991).

Prior to passage of the 1992 Cable Television Consumer Protection and Competition Act (the "1992 Act"), the Commission counted noncommercial television stations when determining

whether a cable system was subject to "effective competition" and therefore exempt from local rate regulation. See 47 C.F.R. §76.33(a)(2). And, under Section 615 of the 1992 Act and any Commission rules promulgated pursuant thereto, noncommercial television stations will have mandatory carriage and channel positioning rights similar to those of commercial television stations. Hence, both as a factual and as a legal matter, WGTV is a part of the Atlanta market, and should be formally recognized as such in the Commission's Table of Markets.

III. THE ADDITION OF ATHENS TO THE ATLANTA MARKET WILL ENHANCE WGTV'S ABILITY TO PROVIDE NONCOMMERCIAL EDUCATIONAL PROGRAMMING.

Arbitron currently ranks Atlanta as the 10th largest television ADI, with 1,119,700 television households in the Atlanta Metro area. 1992 Broadcasting & Cable Market Place at E-21. By contrast, Athens is located in Clarke County, which is outside the Atlanta Metro area and only has 33,400 television households. Id. Since the Atlanta Metro area has a much larger population and consequently a much larger economic base than Athens, WGTV must target the Atlanta Metro area for underwriting contributions, contributions which the Commission has recognized are "an integral part of the Congressionally mandated scheme for financing public broadcasting." Noncommercial Educational FM Broadcast Stations, 69 F.C.C.2d 200, 218 (1978). Indeed, during the year ending June 30, 1992, WGTV received over \$500,000 in program underwriting contributions from businesses in the Atlanta

Metro area. Those contributions represented 100% of WGTV's program underwriting dollars for the period.

The GPTC believes that formally adding Athens to the Atlanta market, would facilitate its ability to obtain underwriting support both in Atlanta and from national entities with facilities in Atlanta. The formal identification of WGTV with the Atlanta market will enhance the station's identification with that growing and prosperous economic area. That identification with Atlanta should improve the GPTC's ability to obtain underwriting contributions from businesses seeking to strengthen their association with educational and charitable entities in Atlanta.

Formal identification with Atlanta will also improve the GPTC's ability to raise underwriting contributions from national corporations with a substantial presence in the Atlanta area. The GPTC's experience has been that often these larger businesses control their charitable and public relations expenditures from their corporate headquarters, and are reluctant to contribute to the GPTC because WGTV is licensed to Athens and is not formally identified as an Atlanta station. Expanding the market definition to include both communities will those strengthen the GPTC's position in demonstrating that supporting WGTV will benefit the residents of the Atlanta area, as well as those in Athens and thus improve the corporation's identification with socially beneficial efforts in Atlanta.

CONCLUSION

For the foregoing reasons, the GPTC requests that the Commission adopt its counterproposal in this proceeding and amend Section 76.51 of its Rules to change the designation of the Atlanta market from "Atlanta" to "Atlanta-Rome-Athens."

Respectfully submitted,

Georgia Public Telecommunications  
Commission



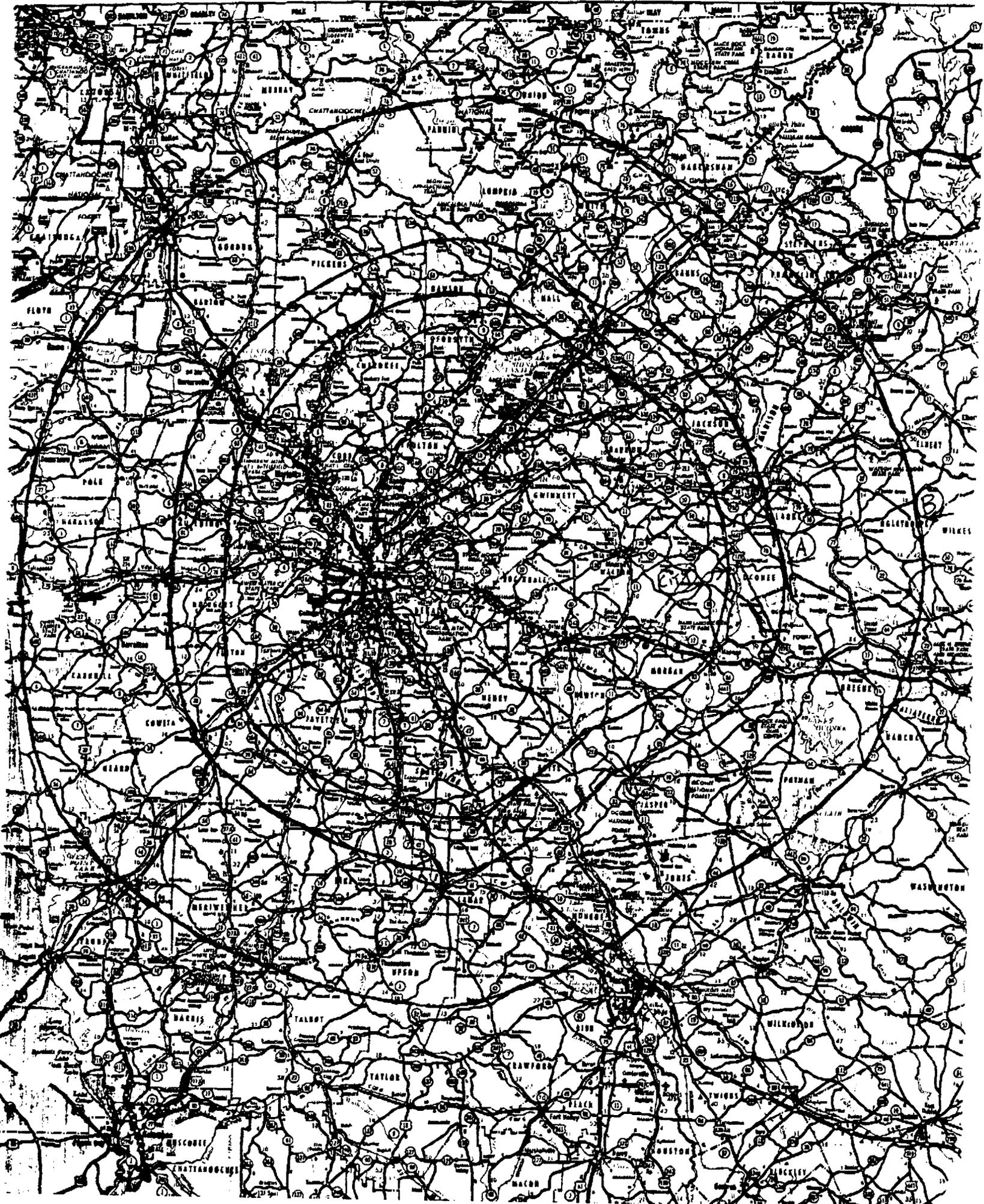
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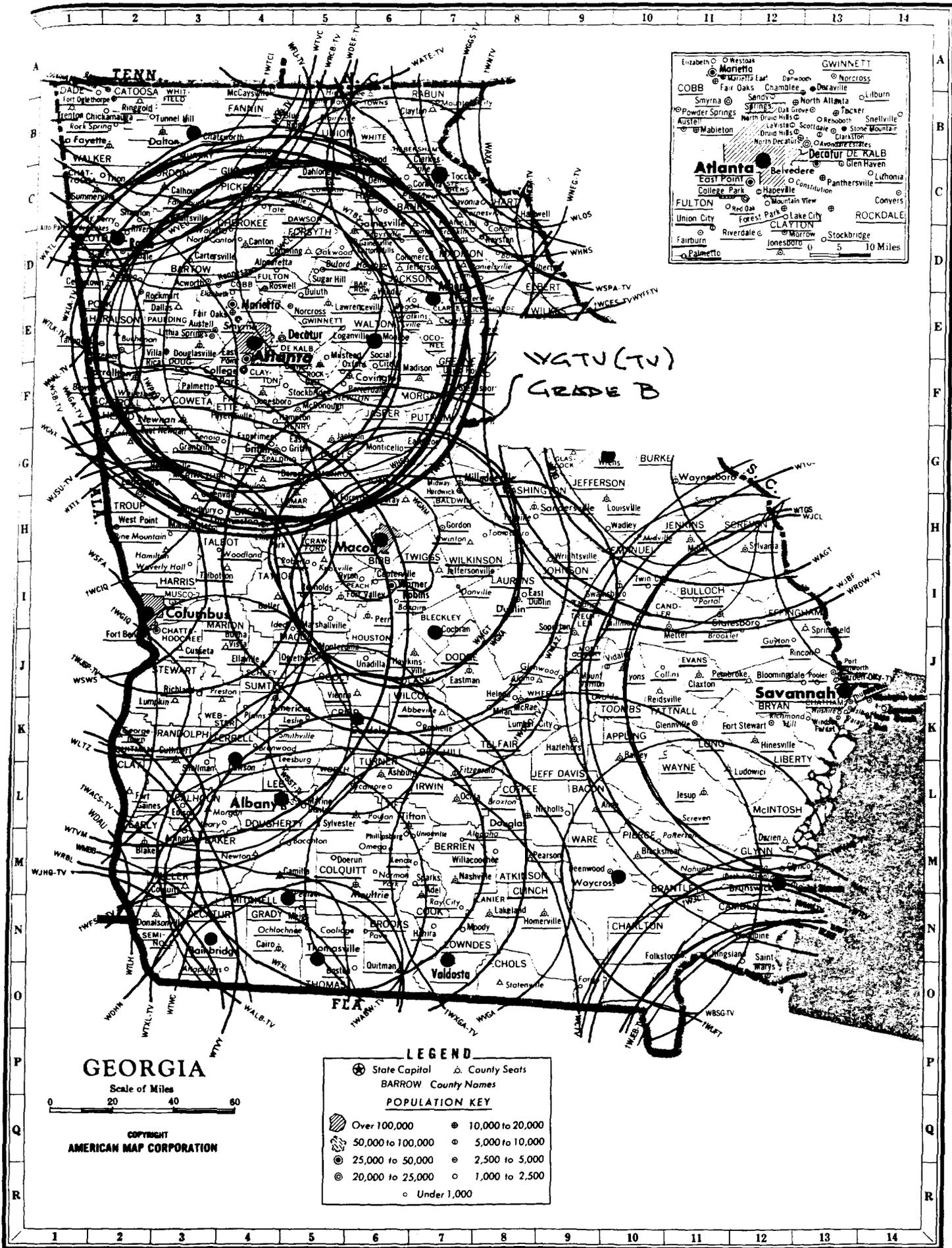
Its Attorneys

Date: January 6, 1993

**EXHIBIT 1**



**EXHIBIT 2**



**EXHIBIT 3**

Aug. 22-28

89¢



SPECIAL  
ISSUE

# IS TV VIOLENCE BATTERING OUR KIDS?

W STUDY  
ANSWERS

#BXBRKJY\*\*\*\*\*CR 10  
#303101549UEAR#G3#  
03500 30310  
GEORGE WEARN  
GPIV  
1540 STEWART AVE SW.  
ATLANTA GA 30310  
2016



0 864415 2

## Channels Listed in the Atlanta Edition

(BW) Black-and-white (CZ) Colorized version

### Broadcast Stations\*

<p style="text-align: center;">—Atlanta—</p> <p><b>2</b> WSB (ABC) 02*</p> <p><b>5</b> WAGA (CBS) 05</p> <p><b>11</b> WXIA (NBC) 11</p> <p><b>17</b> WTBS (Ind.) 17</p> <p><b>30</b> WPBA (PBS) 30</p> <p><b>36</b> WATL (Fox) 36</p> <p><b>46</b> WGNX (Ind.) 04</p> <p><b>69</b> WVEU (Ind.) 69</p>	<p style="text-align: center;">—Athens/Atlanta—</p> <p><b>8</b> WGTV (PBS) 08,18</p> <p style="text-align: center;">—Athens—</p> <p><b>34</b> WNGM (Ind.) 10</p> <p style="text-align: center;">—Rome/Atlanta—</p> <p><b>14</b> WTLK (Ind.) 14</p> <p style="text-align: center;">—Chatsworth—</p> <p><b>18</b> WCLP (PBS) 18</p>	<p style="text-align: center;">—Chattanooga—</p> <p><b>3</b> WRCB (NBC) 03,11</p> <p><b>9</b> WTVC (ABC) 09,02</p> <p><b>12</b> WDEF (CBS) 12,05</p> <p><b>61</b> WDSI (Fox) 61,36</p> <p style="text-align: center;">—Macon—</p> <p><b>13</b> WMAZ (CBS) 13,05</p> <p><b>24</b> WGXA (ABC) 24,02</p> <p><b>41</b> WMGT (NBC) 16,11</p>
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Though not listed in this edition, WHSG, Ch. 63 in Decatur, broadcasts religious programming seven days a week.

In addition to the listings herein, Chs. 8, 18 and 30 schedule instructional classroom programs during the school year.

### Cable TV\*

<p><b>A&amp;E</b> Arts &amp; Entertainment Network 39*</p> <p><b>AMC</b> American Movie Classics 35</p> <p><b>BET</b> Black Entertainment Television 57</p> <p><b>CNN</b> Cable News Network 42</p> <p><b>COM</b> Comedy Central 50</p> <p><b>CSP</b> C-SPAN 56</p>	<p><b>DIS</b> The Disney Channel 53</p> <p><b>DISC</b> The Discovery Channel 37</p> <p><b>ESPN</b> ESPN 34</p> <p><b>FAM</b> The Family Channel 47</p> <p><b>HBO</b> Home Box Office 33</p> <p><b>LIF</b> Lifetime 46</p> <p><b>MAX</b> Cinemax 45</p> <p><b>MTV</b> Music Television 48</p>	<p><b>NIK</b> Nickelodeon 38</p> <p><b>SHD</b> Showtime 41</p> <p><b>SS</b> SportSouth Network 40</p> <p><b>TMC</b> The Movie Channel 58</p> <p><b>TNN</b> The Nashville Network 49</p> <p><b>TNT</b> Turner Network Television 52</p> <p><b>USA</b> USA Network 44</p> <p><b>WGN</b> WGN (Chicago; Ind.) 55</p> <p><b>WOR</b> WWOR (New York; Ind.) 60</p>
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\***VCR Plus + Instant Programmer™**. The numbers that appear above next to each broadcast and cable channel, as well as the PlusCode™ numbers on most daily listings, are for the convenience of viewers who own VCR Plus +™ devices for VCR taping. In addition to the instructions in the owner's manual, some VCR Plus +™ owners need to make an additional one-time-only adjustment. If two numbers appear above next to any of the channels you receive, you'll need to follow the instructions for Step 4 in the owner's manual for each of the two numbers listed. Call 1-800-4321-VCR for further information. VCR Plus +™ and PlusCode™ are trademarks of Gemstar Development Corporation. PlusCode™ numbers copyright 1992 GDC. All rights reserved.

The following channels are also offered by some cable systems. **American Christian Television System (ACTS)**, **Eternal Word Television Network (EWTN)**, **The New Inspirational Network**, **Trinity Broadcasting Network** and **Vision Interfaith Satellite Network** are religious and family-entertainment channels. **The Box and Video Hits One (VH-1)** consist primarily of music videos. **Cable Satellite Public Affairs Network (C-SPAN)** and **C-SPAN 2** cover House and Senate sessions, respectively, as well as Congressional hearings and public-affairs programming. Check listings for details on C-SPAN. **CNN Headline News** offers continuous news capsules. **CNBC** offers financial news, lifestyle and talk shows. **E! Entertainment Television** highlights various aspects of the entertainment industry. **Home Shopping Network** and **QVC** are shop-by-phone services. **The Learning Channel** offers educational programming. **The Travel Channel** provides information on business and leisure travel. **The Weather Channel** reports on national and local weather.

**Cable Viewers:** As a result of FCC rules on Syndicated Exclusivity, you may find programs on out-of-town stations either blacked out or replaced with alternative programming provided by your cable system.

#### Symbols for hearing-impaired viewers

(CC) Closed-captioned  
(Special decoder needed)

(OC) Open-captioned  
(Visible without decoder)

(SL) Interpreted in sign language  
(Interpreter appears on screen)

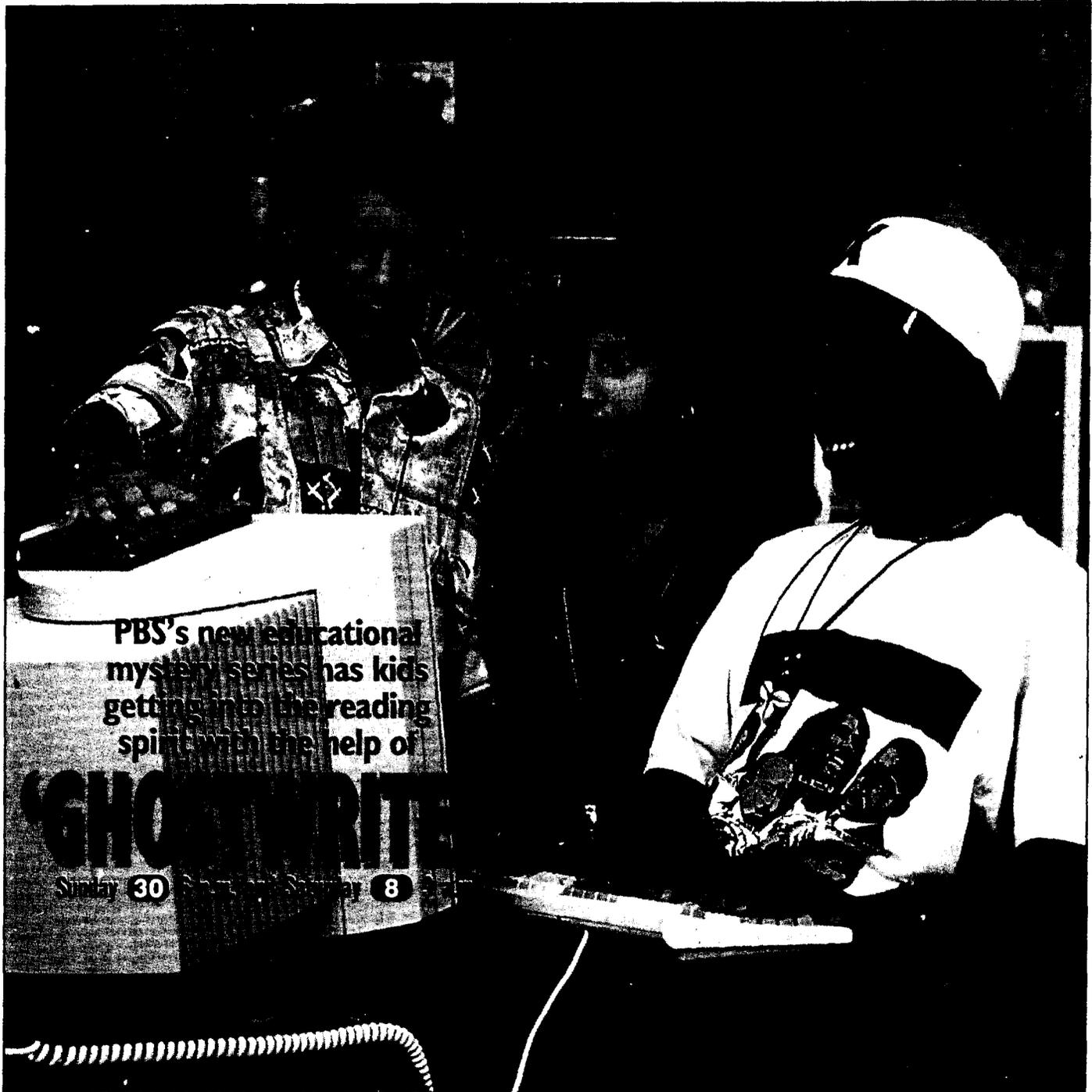
# TV WEEK

THE ATLANTA JOURNAL / THE ATLANTA CONSTITUTION



**'The Dangerous Tour'**  
Sony's \$50 million man, Michael Jackson, has his first full-length TV concert.

Saturday HBO 8 p.m.



PBS's new educational mystery series has kids getting into the reading spirit with the help of

**'GHO GHOSTS'**

Sunday 30 Saturday 8



## 'Running Mates'

Diane Keaton and Ed Harris juggle their hot romance on the campaign trail in cable's aptly timed political satire.

Sunday HBO 8 p.m.



## 'Rediscovering America'

The Smithsonian's Roger Kennedy revisits the cowboy era and debunks some common misconceptions on "The Real American Cowboy."

Monday Discovery Channel 8 p.m.



**EXHIBIT 4**

# THE ATLANTA CONSTITUTION

FRIDAY, DECEMBER 4, 1992



JOHNNY CRAWFORD / Staff

**What's hot this year?** Barney the dinosaur, at the top of many kids' gift lists.

## Gee, Mom, all I want from Santa is a dinosaur

By Maureen Downey  
STAFF WRITER

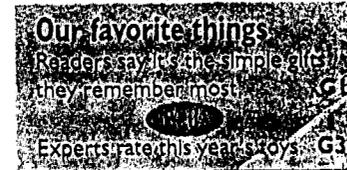
This holiday season, nobody's asking, "Where's Waldo?" Everyone wants to know, "Where's Barney?"

The purple and green dinosaur, who stars in a children's show on the Public Broadcasting System, is turning into the jingle-bell ringer of the retail season.

"We can't keep him on the shelves," says JCPenney spokeswoman Carol Edwards.

He arrived with a ready-made market. Nearly 2 million homes tune in to "Barney & Friends" daily, making him the Elvis of the sippie-cup set.

As a teacher, Laura Mantrone, 36, monitors what her 15-month-old son watches on TV, and she gives Barney high marks. There are no quick cuts or flashy video techniques, just Barney being silly with four or five children. And each show ends with a song — full of love, kisses and hugs — that has



emerged as a kiddie national anthem.

"I've been all over trying to find one of these," said Nancy Jackson of Snellville, who finally discovered a \$19.99 plush version at the "Barney Shop" in the JCPenney store at Northlake Mall.

Barney has been a Tyrannosaurus-sized hit since his PBS debut in April. When Georgia Public Television built a pledge drive around Barney, it brought in \$611 a minute. Children's shows typically raise \$75 a minute.

"Barney & Friends" airs at 8 a.m. and 5:30 p.m. weekdays and 7:30 a.m. Saturdays on Channel 8 and at 8:30 a.m. Sundays on Channel 30.

December 11, 1992

# Serving country and mankind

## 'Liberators' chronicles black soldiers' heroism

By Drew Jubera  
TV CRITIC

"Liberators" is a shockingly profound documentary of two stories twined around one moment, a moving piece of unearthed history that singles out heroism in a time of dual, separate societies.

Narrated by Denzel Washington, there is the tale of the 183rd Combat Engineer Corps and of the 761st, an African-American tank battalion known as the Black Panthers. They spearheaded

### TV REVIEW

**"Liberators: Fighting on Two Fronts in World War II"**

Part of the "American Experience" series, tonight at 9 on WPBA/Channel 30 (13966) and 9:30 on WGTW/Channel 8 (26558).

ed Gen. George S. Patton's charge across Europe, and finally liberated victims of another brand of persecution in concentration camps at Buchenwald and Dachau.

There is also the tale of the segregated country and armed forces those same soldiers served.

"We wore the same uniform, we were there for the same reason," says one black veteran, "but we couldn't do the same things."

Still, African-Americans supported the war, though their duty was rarely repaid. When at last sent into combat, black troops were ever aware of their contradictory circumstance. One recalls his anger after seeing a carnage of black bodies: "I was angry at my country for using me to fight for rights and privileges I wasn't good enough to enjoy at home."



PBS  
**World War II veterans from the 761st tank battalion, known as the Black Panthers, meet on Long Island, N.Y.**

Yet their reward came — not from their countrymen, but from the French they defended and especially the Jews they freed.

"For the first time, I saw a black face," says one concentration camp survivor. "For me, I wasn't surprised. Because I was told there was a country named America, that was part of a dream of liberation, part of a dream of redemption — a different planet."

It was the return of these soldiers that really did remake the American "planet." "Home was the same," Mr. Washington says, "but the men who had seen war and the face of death were changed for good."

Soon, their country would follow.

October 13, 1992

# What role did race play in the Thomas hearings?

By Drew Juber  
TV CRITIC

The season premiere of PBS's "Frontline" heads to the one corner of last year's Clarence Thomas confirmation hearings left largely untouched by the mainstream media and political establishment: race.

According to the president, the media and the all-white Senate panel that conducted the hearings, that circumstance had little to do with anything.

But to many African-Americans, whose voices often were drowned out by white commentators, analysts and feminists, race was a central theme that prompted a river of troubling and conflicting issues in the black community.

"Public Hearing, Private Pain" distinguishes itself, a year after the hearings, by making those voices and issues the real hook that kept Americans glued to their TVs.

"The white community has no idea what's going on," sums up one black woman who watched the hearings. "My white friends were outraged, and I was, 'Honey, I won't discuss it.'"

The issue has many sides, and Emmy-winning filmmaker Ofra Bikel looks at them all. She explores the white guilt that paralyzed many Democrats and liberals during Mr. Thomas's hearing, and Mr. Thomas's ability to manipulate it — a tactic he had claimed to abhor until his nomination began to slip away.

She explores racism in the black community, raised as Mr. Thomas's memories of his dark skin causing taunts from lighter skinned blacks, a circumstance that many blacks see as forming

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## TV PREVIEW

Frontline's "Public Hearing, Private Pain"

9 tonight on WPBA/Channel 30 (58961) and 10 p.m. on WGTU/Channel 8 (13508).

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Mr. Thomas's love/hate relationship with his own people.

"It's not that he came from the wrong side of the tracks," says one person, "but from the wrong side of the *black* tracks."

The tension between black women and white feminists also is plumbed, with many black women revealed as resentful of the feminists who captured the debate during the hearings.

"No way do they understand some of the subtle nuances of race, gender and class, because [the feminist] movement is directed by middle-class white women," says one.

But the conflict felt most deeply by many black women, including students at Atlanta's Spelman College, came from the tenet drummed into them "since birth": Never betray the black man, which Anita Hill often was accused of doing.

"When do I speak up for me, and when do I segregate my desires for the good of the race?" says one black professional woman. "What do I tell my daughters? That no matter what your ambitions are . . . you must sacrifice your mental health and physical well-being for the betterment of the race?"

With issues as complex as these, answers are hard to come by. But raising the issues, even a year too late, is a start, and credit for that goes to "Frontline."

October 2, 1992

## PBS panel's loud wrangling reflects problems when 'The Issue Is Race'

By Stephanie Schorow  
ASSOCIATED PRESS

**Boston** — The concept seems so progressive, so PBS.

Collect eight articulate, divergent panelists — ranging from rap artist Sister Souljah to Boston University president John Silber — to talk about the issue of race in America.

Get the talkmaster himself, Phil Donahue, to call the shots and let them go at it. After the fireworks, reach a consensus.

Instead, in the taping of "The Issue Is Race" by PBS-affiliate WGBH-TV in Boston, the sparks didn't die. The dialogue went nuclear (some tape had to be edited out because of the shouting) and hopes for a traditional liberal consensus vanished like the Great Society.

All this makes the two-hour public forum both painful and

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### TV REVIEW

#### "The Issue Is Race"

9 tonight on Channel 30 (89666) and 10 tonight on Channel 8 (70802).

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penetrating.

Ultimately, the panel's loud wrangling does more to illuminate the dilemma of race relations in America than would a feel-good forum that ends with easy answers.

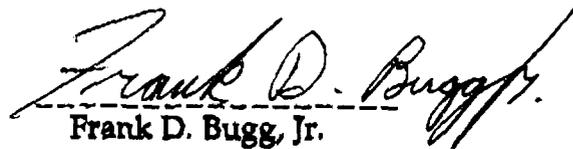
Panelist Jonathan Kozol, author of "Death at an Early Age" and "Savage Inequities," reflected the somber mood, concluding: "I've sat on panels on television 25 years ago and heard exactly the same debate between white and blacks and within the ranks of black people and that underlines what's on my mind today. . . . I just think to myself nothing has changed."

**Declaration**

Frank D. Bugg, Jr. hereby declares under the penalty of perjury:

1. I am Deputy Director of the Georgia Public Telecommunications Commission (GPTC) and have been employed by the GPTC and its predecessor agencies in various capacities for over fifteen years. I am familiar with the operations of the GPTC, including those relating to Station WGTV(TV), Athens, Georgia.

2. I have read the foregoing Comments and Counterproposal of the GPTC and the factual assertions contained in that document are true and correct.

  
Frank D. Bugg, Jr.

Date: January 6, 1993

ORIGINAL DECLARATION TO BE FILED LATER